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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SENECA A. DURR,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01907-APG-PAL

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND**

(First Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from February 25, 2019 to **March 29, 2019**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office on bereavement leave to attend funeral and prayer services following the death of her aunt. In addition, Counsel has over 80+ active social security matters that require two or more dispositive motions per week until mid-April. For example, at this time, Counsel has over 18 dispositive motions due in the month of March, and currently four other dispositive motions due on the same date as the current filing

1 deadline. As such, Counsel respectfully requests additional time to adequately review the transcript
2 and respond to the issues raised in Plaintiff's Motion. Defendant makes this request in good faith with
3 no intention to unduly delay the proceedings. Defendant apologizes for the belated request for
4 extension, but had ongoing health and personal family issues and filed an extension of time as soon as
5 reasonably practicable. The parties further stipulate that the Court's Scheduling Order shall be
6 modified accordingly.
7

8 Respectfully submitted,

9 Dated: February 22, 2019

/s/ Joshua Harris

(*as authorized by email on February 22, 2019)

JOSHUA HARRIS

Attorney for Plaintiff

13 Dated: February 22, 2019

NICHOLAS A. TRUTANICH

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

17 By /s/ Tina L. Naicker

TINA L. NAICKER

Special Assistant U.S. Attorney

Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22
23 DATED: February 25, 2019



THE HONORABLE PEGGY A. LEEEN

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 22nd day of February 2019,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney